

RESPONSE TO COMMENTS ON DRAFT PERMIT
SEH America

Notice was published in the newspaper on December 9, 2002 in the newspaper, *The Columbian*, that the draft permit was available for review and comment by any interested or affected parties. During the 30-day review period comments were received only from the permit applicant. These comments suggest two minor changes in the draft permit, which the permitting authority has agreed to incorporate. The summarized comments (in italics) and agency responses follow.

1. *Change the upper pH limit from 8.5 to 9.0, seasonally only (May 15th to September 15th). This change would accommodate a natural rise in pH that occurs in the storm water retention pond in summer months, caused by the dissolution of carbon dioxide from the respiration of algae in the pond.* The permitting authority has determined that there is in fact no justification for pH limits at all on this discharge in the current permit, since the discharge consists only of impounded rain water runoff and wastewaters which are not pH-affected by the industrial processes. The natural pH rise noted in daytime sampling would be offset by a corresponding pH drop at night. And, more importantly, the pH of ground water is much more affected by constituents of the soil through which the water passes than it is by the pH of the source water. (Consider that the pH of the primary source water, rain, is probably in the range of 4 to 5.) On the basis of these considerations, the permitting authority has decided to remove all pH limits and pH monitoring requirements from the permit.
2. *Include discharge of up to 60 gallons per minute excess reclaimed water through Outfall No. 002. This clean water is currently discharged to the municipal sanitary sewer system, where it takes up capacity unnecessarily.* The permitting authority has determined that this discharge would be a minor addition in terms of volume and that it contains no pollutants of concern in significant amounts. Therefore, this wastestream is added to the permitted discharges from Outfall No. 002, as requested.

In summary, as a result of the comments received from interested and affected parties, the draft permit was modified to exclude all pH and Aquashade® limits and monitoring, and to add the discharge of excess reclaimed water to the list of permitted discharges at Outfall No. 002.